

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DANNY WENG; CHRISTOPHER HART;
MARKUS VALLASTER; SARAH ZESCH;
JOHN STANTON; MICHAEL GOULD; and
COMMONWEALTH SECOND
AMENDMENT, INC.,

Plaintiffs,

-against-

WILLIAM B. EVANS, in his Official Capacity
as Commissioner of the Boston Police
Department; and DANIEL C. O'LEARY, in his
Official Capacity as Chief of the Brookline
Police Department,

Defendants.

CIVIL ACTION NO.
1:16-cv-10181-FDS

PARTIALLY ASSENTED-TO MOTION TO EXTEND DEADLINE

Plaintiffs present this partially assented-to motion to extend the deadline for filing summary judgment moving papers by 5 days, from August 25, 2017 to August 30, 2017. In support of this motion, Plaintiffs state as follows:

1. The parties completed depositions just over a month ago, on July 19, 2017. Counsel received the transcripts from the final depositions only earlier this week. The need to thoroughly review these transcripts and incorporate their content has significantly impacted counsel's ability to finalize the motion papers.
2. Plaintiffs contacted counsel for both Defendants on Wednesday, August 23, 2017 to request assent to this extension. Counsel for Defendant Evans assented.
3. However, counsel for Defendant O'Leary is on vacation and has not been in communication via email. We were unable to reach anyone in his office who was

familiar with this matter and could provide a response to our request.

Presumably, counsel for Defendant O'Leary will respond to the request for assent when he returns to the office on Monday, August 28, 2017.

4. The deadline for submitting oppositions and/or cross-motions is September 22, 2017. At the present time, it does not appear that granting this extension will require adjustment of the other deadlines.

Dated: August 25, 2017

Respectfully submitted,

THE PLAINTIFFS,

By their attorneys,

/s/ David D. Jensen
David D. Jensen, Esq.
Admitted *Pro Hac Vice*
DAVID JENSEN PLLC
111 John Street, Suite 420
New York, New York 10038
Tel: 212.380.6615
Fax: 917.591.1318
david@djensenpllc.com

Patrick M. Groulx, Esq.
BBO No. 673394
Isenberg Groulx LLP
368 W Broadway, Suite 2
Boston, Massachusetts 02127
Tel: 617.859.8966
Fax: 617.859.8903
pmgroulx@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 25, 2017.

/s/ David D. Jensen

David D. Jensen